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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;  
ORACLE AMERICA, INC., a Delaware  
corporation; and ORACLE INTERNATIONAL  
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;  
SETH RAVIN, an individual,

Defendants.

Case No 2:10-cv-00106-LRH-PAL

**PLAINTIFFS' MOTION TO SEAL  
EXHIBIT H TO THE DECLARATION  
OF BREE HANN**

Date: January 10, 2012  
Time: 10:30 a.m.  
Place: Courtroom 3B  
Judge: Magistrate Peggy A. Leen

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 21, 2010, Dkt. 55 (“Protective Order”), and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation (together “Oracle” or “Plaintiffs”) respectfully request that the Court order the Clerk of the Court to file under seal Exhibit H to the Declaration of Bree Hann in Support of the Parties’ Joint Case Management Conference Statement (“Hann Exhibit H”). An unredacted version of Exhibit H was individually lodged under seal with the Court on January 6, 2012. *See* Dkt. 218.

Sealing Hann Exhibit H is requested because the document contains information that Oracle has designated as “Highly Confidential Information – Attorneys’ Eyes Only” under the terms of the Protective Order. The Protective Order states, “Counsel for any Designating Party may designate any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information – Attorneys’ Eyes Only’ under the terms of this Protective Order **only if such counsel in good faith believes that such Discovery Material contains such information and is subject to protection under Federal Rule of Civil Procedure 26(c).** The designation by any Designating Party of any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information – Attorneys’ Eyes Only’ shall constitute a representation that an attorney for the Designating Party reasonably believes there is a valid basis for such designation.” Protective Order ¶ 2 (emphasis supplied).

Oracle has identified Hann Exhibit H as containing portions that are Confidential and Highly Confidential, and Oracle represents that good cause exists for sealing those portions of the documents. Rimini has also requested that Oracle file Hann Exhibit H under seal on the grounds that it contains Confidential and Highly Confidential materials, and Rimini represents that good cause exists for sealing the document. This is a sufficient showing of good cause to permit a sealing order on a non-dispositive motion. *See, e.g., Pacific Gas and Elec. Co. v. Lynch*, 216 F. Supp. 2d 1016, 1027 (N.D. Cal. 2002).

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1 Oracle has submitted all other exhibits to the Declaration of Bree Hann for filing in the  
2 Court's public files, which would allow public access to all exhibits except for Hann Exhibit H.  
3 Accordingly, the request to seal is narrowly tailored.

4 For the foregoing reasons, Oracle respectfully requests that the Court find that good cause  
5 exists to file under seal Hann Exhibit H.

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7 DATED: January 6, 2012

BINGHAM McCUTCHEN LLP

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9 By: /s/ Geoffrey M. Howard  
10 Geoffrey M. Howard  
11 Attorneys for Plaintiffs  
12 Oracle USA, Inc., Oracle America, Inc.,  
13 and Oracle International Corp.  
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